

**UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TENNESSEE**

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JESUS R. SANCHEZ, on behalf of himself	)	
and all others similarly situated,	)	
	)	
Plaintiffs,	)	
	)	Case No. 2:11-cv-02548-STA-cgc
v.	)	
	)	JURY DEMANDED
VERIFIED PERSON, INC.,	)	
	)	
Defendant,	)	
and	)	
	)	
E-BACKGROUNDCHECKS.COM, INC.,	)	
	)	
Defendant.	)	

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**DEFENDANT E-BACKGROUNDCHECKS.COM, INC.'S UNOPPOSED MOTION FOR  
AN EXTENSION OF TIME TO ANSWER OR OTHERWISE RESPOND TO  
PLAINTIFF'S COMPLAINT**

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Pursuant to Rule 6(b) of the Federal Rules of Civil Procedure, Defendant e-BackgroundChecks.com, Inc. ("BGC") hereby moves the Court for an extension of time up through and including April 10, 2012 in which to answer or otherwise respond to Plaintiff's First Amended Class Action Complaint. In support of its unopposed motion, BGC respectfully shows the Court as follows:

1. Plaintiff filed his First Amended Class Action Complaint (Dkt. No. 24) on February 2, 2012 and sent Defendant BGC a Waiver of the Service of Summons that same day.
2. BGC waived service pursuant to Rule 4(d) of the Federal Rules of Civil Procedure on February 29, 2012 (Dkt. No. 29).

3. Pursuant to Rule 12(a)(1)(A)(ii) of the Federal Rules of Civil Procedure, BGC has until April 3, 2012 to answer or otherwise respond to Plaintiff's Complaint.

4. This matter is a putative nationwide class action. BGC seeks to provide a thoughtful and appropriate response to the Complaint, and requires additional time to evaluate the Complaint's allegations. Accordingly, BGC requests an additional seven (7) days—up through and including April 10, 2012—to answer or otherwise respond to the Complaint.

5. The requested seven day extension will neither prejudice Plaintiff nor delay the timely resolution of this civil action, which is still in its early stages.

6. Undersigned counsel hereby certifies that counsel for BGC has conferred with counsel for Plaintiff, and is authorized to represent that Plaintiff does not oppose the relief requested in this Motion.

WHEREFORE, BGC respectfully requests entry of an Order extending its time up through and including April 10, 2012 to respond to Plaintiff's Complaint. A proposed Order is submitted herewith as required by the Local Rules.

Dated: March 29, 2012

Respectfully submitted,

s/ Angie C. Davis

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*Attorneys for Defendant*  
*E-BackgroundChecks.com, Inc.*

**CERTIFICATE OF CONSULTATION**

As required by Local Rule 7.2, Counsel for Defendant e-BackgroundChecks.com, Inc., John Jett, consulted with Counsel for Plaintiff, Matt Dooley, via e-mail on March 29, 2012. Counsel for Plaintiff indicated that he does not oppose the relief requested herein.

s/ Angie C. Davis  
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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on this 29th day of March 2012, a copy of the foregoing electronically filed Defendant e-BackgroundChecks.com, Inc.'s Unopposed Motion for an Extension of Time to Answer or Otherwise Respond to Plaintiff's Complaint was served on the parties listed below via first class mail, postage prepaid, unless said party is a registered CM/ECF participant who has consented to electronic notice, and the Notice of Electronic Filing indicates that Notice was electronically mailed to said party:

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s/ Angie C. Davis  
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